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Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
 FOR THE
 NORTHERN MARIANA ISLANDS

LI YING HUA, LI ZHENG ZHE and XU JING JI,) CASE NO. CV 05-0019

Plaintiffs,

vs.

JUNG JIN CORPORATION, a CNMI corporation,
 ASIA ENTERPRISES, INC., a CNMI corporation,
 PARK HWA SUN and KIM HANG KWON,
 KSK CORPORATION, a CNMI corporation, and
 KIM KI SUNG,

Defendants.

EX PARTE MOTION UNDER LOCAL
 RULES 7.1.h.3(b) AND 7.1.h.5 FOR
 ADDITIONAL TIME TO FILE
 DISPOSITIVE MOTIONS

Date: No hearing requested
 Time: No hearing requested
 Judge: Hon. Alex R. Munson, Chief Judge

Plaintiffs, by and through their undersigned attorney of record, hereby file, this Motion, *ex parte*, pursuant to Fed R. Civ. P. 6(b) and Local Rule 7.1.h.2 to request a one (1) day extension of time to file a Motion for Summary Judgment on the claims against Defendants KSK Corporation and Kim Ki Sung, the Memorandum and Proposed Findings of Uncontroverted Fact in support thereof.

CERTIFICATE PURSUANT TO LOCAL RULE 7.1.H.3(b)

1. I am the attorney for Plaintiffs in the above-captioned case. I submit this certificate pursuant to Local Rules 7.1.h.3(b) in support of Plaintiffs' *ex parte* motion for an order allowing a one (1) day extension of time to file a Motion for Summary Judgment on the claims against Defendants KSK Corporation and Kim Ki Sung, the Memorandum and Proposed Findings of Uncontroverted Fact

1 in support thereof. In support of this motion, Plaintiffs submit this Certificate of the undersigned.

2 2. On October 12, 2007, with leave of Court, Plaintiffs filed a Second Amended Verified
3 Complaint adding two defendants — KSK Corporation and Kim Ki Sung — bringing claims against
4 those two defendants for successor liability and for fraudulent conveyance arising out of, *inter alia*,
5 transfers of the original four defendants' assets to these two new defendants during the pendency of
6 part I of this case.

7 3. As currently set, dispositive motions must filed by June 19, 2008 at 3:00 p.m.

8 4. I have been working diligently on dispositive motions and documents that show fully
9 developed, undisputed facts upon which the motions are based.

10 5. Despite my efforts, because of unexpected and unscheduled intervening events, I have
11 been unable to complete the extensive fact portions of the Proposed Findings of Uncontroverted
12 Fact, and the citation of those Proposed Findings in the Memorandum of Law in support of the
13 Motion for Summary Judgment.

14 6. This is the third request to continue the due date for filing dispositive motions. The first
15 request by stipulation between the parties and allowed by the Court moved, *inter alia*, the filing date
16 from April 24, 2008 to May 22, 2008. The second, also by stipulation and order, moved, *inter alia*,
17 the filing date from May 22, 2008 to June 19, 2008.

18 7. The extension requested herein is for one (1) additional day.

19 8. The extension requested herein will NOT change the hearing date nor will it affect the
20 present response and reply dates or any other scheduled matters.

21 9. Defendants KSK Corporation and Kim Ki Sung are represented by the following counsel:

22 G. Anthony Long, Esq.
23 LAW OFFICE OF G. ANTHONY LONG
24 P.O. Box 504970
25 Saipan, Mariana Islands 96950
26 E-mail: gal@nmilaw.com

27 10. Counsel for Defendants KSK Corporation and Kim Ki Sung was notified of Plaintiffs'

1 intent to file, *ex parte*, for a one day extension to file dispositive motions and he stated that one day
2 was fine and that he would stipulate to more than one day if requested.

3 11. Four of the defendants are proceeding *pro se* since the withdrawal of their attorney prior
4 to the judgment in this matter. Their last know contact information is as follows:

5 Jung Jin Corporation
6 P.O. Box 503428
7 Saipan, MP 96950
(670) 235-4321

Park Hwa Sun
P.O. Box 503428
Saipan, MP 96950
(670) 235-4321

8 Asia Enterprises Inc.
9 P.O. Box 503448
Saipan, MP 96950
(670) 235-4321

Kim Hang Kwon
P.O. Box 503448
Saipan, MP 96950
(670) 235-4321

10 12. The above-listed *pro se* defendants will receive a copy of this motion by mail.

11 13. Counsel for Defendants KSK Corporation and Kim Ki Sung will receive a copy of this
12 Motion by the Court's Electronic Case Filing system upon the filing of this Motion.

13 WHEREFORE, for the foregoing reasons, Plaintiffs respectfully request that the Court grant
14 their motion for a one (1) day extension of time to file a Motion for Summary Judgment on the
15 claims against Defendants KSK Corporation and Kim Ki Sung, the Memorandum and Proposed
16 Findings of Uncontroverted Fact in support thereof. A proposed order has been submitted herewith
17 for the Court's convenience. Plaintiffs waive any hearing on this Motion.

18 Respectfully submitted this 19th day of June, 2008.

19
20 /s/ Mark B. Hanson

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MARK B. HANSON

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25 Facsimile: (670) 233-5262
E-mail: mark@saipanlaw.com

26 Attorney for Plaintiffs
27

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing will be deposited in the United States Post Office, first class mail, postage prepaid, addressed to the following:

Jung Jin Corporation
P.O. Box 503428
Saipan, MP 96950
(670) 235-4321

Park Hwa Sun
P.O. Box 503428
Saipan, MP 96950
(670) 235-4321

Asia Enterprises Inc.
P.O. Box 503448
Saipan, MP 96950
(670) 235-4321

Kim Hang Kwon
P.O. Box 503448
Saipan, MP 96950
(670) 235-4321

I further certify that the following were served with a copy of the foregoing via the Court's electronic case filing system and via e-mail:

G. Anthony Long, Esq.
LAW OFFICE OF G. ANTHONY LONG
P.O. Box 504970
Saipan, Mariana Islands 96950
E-mail: gal@nmilaw.com

DATED: June 19, 2008

/s/ Mark B. Hanson

MARK B. HANSON